

WASTE SITE RECLASSIFICATION FORM

Operable Unit: 100-KR-2

Control No.: 2016-011

Waste Site Code(s)/Subsite Code(s):

100-K-122 (1706KE, 1706KEL, and 1706KER Facilities)

Reclassification Category: Interim ☐ Final ☒
Reclassification Status: Closed Out ☐ No Action ☐ Rejected ☒

 RCRA Postclosure ☐ Consolidated ☐ None ☐
Approvals Needed: DOE ☒ Ecology ☐ EPA ☒
Description of current waste site condition:

(What is the current physical state of the site? What activities have been performed?)

The site has been subjected to a removal action (demolition of 1706KE, 1706KEL, and 1706KER) and a interim remedial action to remove contaminated geologic media.

See attachment.

Basis for reclassification:

(How does the site meet the reclassification status?)

At the completion of the both the removal action and remedial action, evidence suggests that all building debris (including transite debris) had been removed from the site. Interviews with project personnel (AHERA qualified) and photographic evidence support this position.

A Removal Action Report was completed and signed by project and DOE-RL personnel confirming the the requirements of the Removal Action Work Plan were met.

A recent walkdown by Environmental Compliance Quality Assurance confirms the visual absence of transite debris on the site in its current configuration.

See attachment.

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Project Manager comments:

NA

Waste Site Controls:

Engineered Controls: ☐ Yes ☒ No Institutional Controls: ☐ Yes ☒ No O&M Requirements: ☐ Yes ☒ No

If any of the Waste Site Controls are checked Yes, specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents:

M. S. French

DOE Federal Project Director (printed)



Signature

10/12/16

Date

NA

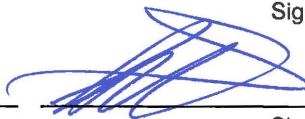
Ecology Project Manager (printed)

Signature

Date

R. A. Lobos

EPA Project Manager (printed)



Signature

10/12/16

Date

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Recommendation:

Reclassify the 100-K-122 waste site as "Final-Rejected" in WIDS.

Background:

The 1706KE facility, including the 1706KEL and 1706KER facilities, were demolished between October 2010 and September 2011. The facilities contained regulated asbestos-containing material (RACM) which was fully abated during hazardous material removal actions prior to facility demolition. Some of the aboveground portions of the 1706KE and the 1706KER facilities were surfaced with cement asbestos board paneling (hereafter referred to as transite) which was removed during demolition, as allowed by approved CERCLA documentation, DOE/RL-2005-26, Revision 1, "Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities". The Deactivation, Decommissioning, Decontamination, and Demolition (D4) organization removed all materials from the ground surface up. The Remedial Action organization removed structural materials internal to the basement walls and foundation of 1706KE and 1706KER during demolition. Demolition materials were disposed at ERDF.

The Remedial Action Project completed removal of the 1706KE and 1706KER basement by continuing demolition and direct load of containers for disposal (no staging or stockpile area). The facilities were fully removed and the excavation was advanced to approximately 3.3 feet below the lowest point of the basement structure according to civil surveys. No demolition debris remained in the excavation.

The soil beneath the 1706KE, 1706KEL and 1706KER facilities was remediated using the selected remedy remove, treat, and dispose (RTD). The remediation was performed in accordance with DOE/RL-96-17, Revision 6, "Remedial Design Report/Remedial Action Work Plan (RDR/RAWP) for the 100 Area". Verification sample results documented in DOE/RL-2012-40, Revision 0, "Remaining Sites Verification Package for the 100-KR-2 Operable Unit Waste Sites 100-K-3 (partial), 100-K-36, and 100-K-79 Subsite 7 (partial) and 1706-KE, 1706-KEL and 1706-KER Facilities, Documentation for Waste Site Reclassification Form 2012-083" demonstrate the remedial action goals were achieved and the soil cleanup standards were met.

The area comprising the footprint of the facilities was backfilled with approximately 5 feet of clean borrow material from an approved borrow source.

Summary Table of Elevations (approximate):

Component	Elevation (feet)	Delta From Original Grade (feet)	Source
Grade (pre-excavation)	476	0	Elevations H-1-24930KE
Lowest point of facilities	445	-31.2	Structural Concrete Foundation Plan H-1-24941KE
Remediation (Excavation)	441	-34.4	Civil Survey H-1-97742, SHT 1
Backfill	451	-24.6	Civil Survey H-1-97742, SHT 2

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In response to Hanford employee, and US Environmental Protection Agency Region 10, concerns that residual transite debris was present at *some* post-demolition sites, a commitment was made to enter into WIDS, all sites where demolition occurred with transite left in place. These sites were entered into WIDS, whether or not there was physical evidence to support the presence of post-demolition transite debris. The intent was to assure that the sites would be considered in the development of remedial action documentation, and if transite debris was determined to be present, it would be properly considered in the development of remediation goals for the operable unit in which the demolition site was located. Conversely, if it was determined that there was no evidence of the presence of transite debris, the site could be reclassified as "final-rejected". Consistent with this approach, in October, 2012, a new WIDS site was established on the footprint of the previous 1706KE facility. (No specific inspection at the time the WIDS site was established had confirmed the presence of transite debris at this location.)

Justification for reclassification as "Final-Rejected":

1. Following demolition of the facilities, remedial action processes were implemented, resulting in a substantial excavation of soil. Facility debris was not present in the post-excavation surface, or borrow material used as backfill, as confirmed by project personnel (qualified as AHERA inspectors/supervisors).
2. Post-removal action/remedial action walk downs were conducted by AHERA qualified personnel, and a Removal Action Report, DOE/RL-2011-21, Revision 0, "Removal Action Report for the 1706KE, 1706KEL and 1706-KER Ancillary Facilities, 100-K Area", attesting to the completion of the work in accordance with applicable CERCLA documents, was signed by or AHERA-qualified personnel.
3. Visual re-inspection of the final excavation surface is not practical because the facilities have been fully removed, the excavation advanced to approximately five feet below the basement structures, and backfill performed with approximately 5 feet of clean borrow material from an approved borrow source. A visual inspection of the current surface confirms the visual absence of transite at the site in its current configuration (report attached).

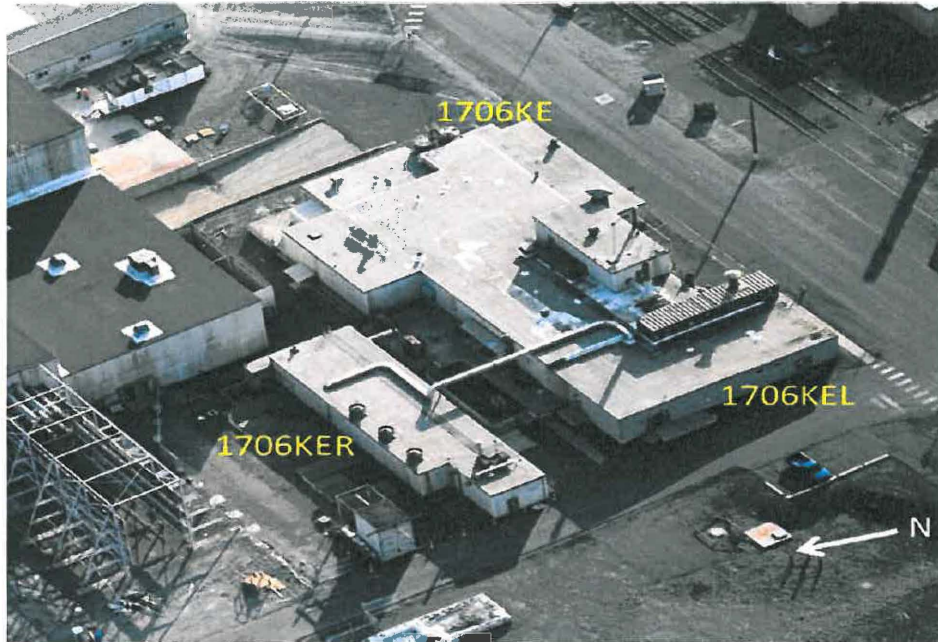
Location of 1706KE/KEL/KER



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Pre-demolition Photo of 1706-KE, 1706-KEL, and 1706-KER Facilities



Photograph During Remedial Action



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Post-Remediation Photograph



Post-backfill photo



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References:

- WIDS General Summary Report for 100-K-122.
- H-1-24930KE, Elevations.
- H-1-24941KE, Structural Concrete Foundation Plan.
- H-1-97590 SHT 1, 100K Area AA Zones 1-3 Pre-Backfill Condition.
- H-1-97590 SHT 2, 100K Area AA Zones 1-3 Post-Backfill Condition.
- Photographs (prior to, during, and after excavation).
- DOE/RL-2005-26, Revision 1, "Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities".
- DOE/RL-2011-21, Revision 0, "Removal Action Report for the 1706KE, 1706KEL and 1706-KER Ancillary Facilities, 100-K Area".
- DOE/RL-2012-40, "Remaining Sites Verification Package for the 100-KR-2 Operable Unit Waste Sites 100-K-3 (Partial), 100-K-79 Subsite 7 (Partial), and 1706-KE, 1706-KEL and 1706-KER Facilities".
- Interviews with the CHPRC D&D Director and Project Manager, Earl Prichard.
- Process knowledge from the CHPRC Remedial Action Director and Project Manager, Randy Havenor.